

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

FILED
JAMES BONINI
CLERK

06 MAR 31 AM 11:34

RICHARD BOHANNON,

Petitioner,

v.

TIMOTHY P. BRUNSMAN, WARDEN,

Respondent.

Case No. C1-01-463

JUDGE SPEIGAL

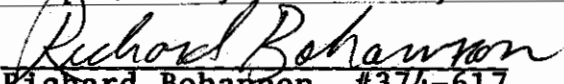
MAGISTRATE JUDGE HOGAN

MOTION FOR APPOINTMENT OF COUNSEL FOR PETITIONER

Petitioner moves this United States District Court for an order appointing counsel to represent petitioner for this habeas corpus action.

A memorandum in support is attached.

Respectfully submitted,


Richard Bohannon, #374-617
Chillicothe Correctional
Institution
P.O. Box 5500
15802 State Route 104 North
Chillicothe, Ohio 45601

MEMORANDUM IN SUPPORT

Petitioner Bohannon lacks the skills and knowledge that are necessary to adequately pursue petitioner's rights without the assistance of professional legal counsel. Petitioner readily admits he possesses less than a layman's comprehension of the law. Petitioner, heretofore, has relied on jailhouse lawyers and himself to research, prepare and file this motion and all other filings in federal court and state courts. Petitioner's continuing and incessant mental health illnesses render him incapable and inadequate to continue his pro se representation.

Briefly, petitioner prior to his arrest on November 10, 1998, was being treated at St. Luke Behavior Center in Covington, Kentucky, for alcoholism, drug abuse, mental illness and for engaging in conduct destructive to himself but not others; he is not a threat to harm others. Prior to petitioner's arrest he had sustained a severe head injury; that and his mental illness are why he had been placed on Social Security disability as far back as January of 1996. The head injury and mental illness prevented petitioner from working. And while being incarcerated here at C.C.I. petitioner has been and is currently being treated for chronic mental illness and is taking prescribed psychotropics to help petitioner cope. Petitioner's mental illness problems can be traced all the way back to his teen years. At one point he was even hospitalized at the now-closed Longview State Hospital in Cincinnati.

Also, as attested by the Affidavit of Indigency filed with

this motion, petitioner is without funds, is financially destitute, therefore, unable to hire an attorney.

Court-appointed counsel is required to protect petitioner's constitutional rights.

WHEREFORE, petitioner respectfully requests that counsel be appointed.

Respectfully submitted,



Richard Bohannon, #374-617
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